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20 *Mitsubishi Electric Visual Solutions America, Inc.*

21 IN THE UNITED STATES DISTRICT COURT
22 FOR THE NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 In re: CATHODE RAY TUBE (CRT)
25 ANTITRUST LITIGATION

26 Master File No. 3:07-cv-05944-SC

27 This Document Relates to:

28 MDL No. 1917

1 *Best Buy Co., Inc., et al. v. Technicolor SA, et*
2 *al., No. 13-cv-05264;*

3 **DECLARATION OF MICHAEL T.**
4 **BRODY IN SUPPORT OF LG AND**
5 **MITSUBISHI ELECTRIC**
6 **SUBSIDIARIES' MOTION FOR**
7 **SUMMARY JUDGMENT**

8 *Electrograph Systems, Inc., et al. v. Technicolor*
9 *SA, et al., No. 13-cv-06325;*
10 *Interbond Corporation of America v. Mitsubishi*
11 *Electric & Electronics USA, Inc., et al., No. 13-*
12 *cv-05727;*

13 Judge: Hon. Samuel Conti
14 Date: February 6, 2015
15 Time: 9:00 AM
16 Crtrm: 1, 17th Floor

17 *Office Depot, Inc. v. Technicolor SA, et al., No.*
18 *13-cv-81174;*

19 *P.C. Richard & Son Long Island Corporation, et*
20 *al. v. Technicolor SA, et al., No. 13-cv-06327;*

21 DECLARATION OF MICHAEL T. BRODY IN SUPPORT OF LG AND MITSUBISHI ELECTRIC SUBSIDIARIES'
22 MOTION FOR SUMMARY JUDGMENT
23 Case No. 3:07-cv-05944-SC; MDL No. 1917

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

Costco Wholesale Corporation v. Technicolor SA, et al., No. 13-cv-02037;

Schultze Agency Services, LLC v. Technicolor SA, Ltd., et al., No. 13-cv-05668;

*Sears, Roebuck and Co., et al. v.
Technicolor SA, No. 13-cv-05262;*

Dell Inc., et al. v. Phillips Electronics North America Corporation, et al. No. 13-cv-00141;

Tech Data Corp., et al. v. Hitachi, Ltd., et al.,
No.13-cv-00157;

Siegel v. Technicolor SA, et al., No.13-cv-05261;

Viewsonic Corporation v. Chunghwa Picture Tubes Ltd., et al., No.13-cv-02510.

DECLARATION OF MICHAEL T. BRODY

I, MICHAEL T. BRODY, declare as follows:

1. I am an attorney licensed to practice law in the State of Illinois, and I am a partner at the law firm of Jenner & Block LLP, attorney of record for Defendants Mitsubishi Electric US, Inc. (“MEUS”) and Mitsubishi Electric Visual Solutions America, Inc. (“MEVSA”). I submit this declaration in support of LG and Mitsubishi Electric Subsidiaries’ Motion For Summary Judgment. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to such facts under oath.

2. The Direct Action Plaintiffs (“DAPs”) have not taken a deposition of any corporate representative or employee of MEUS or MEVSA at any point during the above captioned litigation.

3. [UNDER SEAL] Attached to my declaration as **Exhibit A** is a true and correct copy of excerpts of Mitsubishi Electric Corporation's R. 30(b)(6) Tsukamoto Dep. Vol. I.

4. [UNDER SEAL] Attached to my declaration as **Exhibit B** is a true and correct copy of excerpts of Mitsubishi Electric Corporation's R. 30(b)(6) Tsukamoto Dep. Vol. II.

5. [PUBLIC] MEUS and MEVSA served written discovery requests on the DAPs in the above captioned actions. *See, e.g.*, Mitsubishi Electric Corporation, Mitsubishi Electric Visual Solutions America, Inc., and Mitsubishi Electric US, Inc.'s First Set of Interrogatories to Target Corp., a true and correct copy of which is attached hereto as **Exhibit C**.

6. [PUBLIC] The responses to MEUS's and MEVSA's written discovery from each DAPs are similar in substance. A true and correct copy of Target Corp.'s Objections and Responses to Defendants Mitsubishi Electric Corporation, Mitsubishi Electric Visual Solutions America, Inc., and Mitsubishi Electric US, Inc.'s First Set of Interrogatories, which is representative of the DAPs' responses, is attached hereto as **Exhibit D**.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed this 7th day of November, 2014 at Chicago, Illinois.

By: Michael T. Brody
Michael T. Brody